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10-11-2019

Comment Regarding: Closed Captioning of Video Programming, Petition for Declaratory Ruling and/or Rulemaking on Live Closed Captioning Quality Metrics and the Use of Automatic Speech Recognition Technologies **CG Docket No. 05-231 and MB Docker No. RM-11848**

Dear FCC,

With the potential implementation of Automatic Speech Recognition Technologies in live closed captioned broadcasts, please consider requiring the use of mixed case text for those captions. The current standard (or lack of one) which allows ALL CAPITALIZED TEXT for live broadcasts is abnormal and substandard as the standard for reading text around the world is in mixed case, the same as this letter and all FCC written communications. Mixed case text can be instantly converted to "ALL CAPS" for those who find a need or desire. Mixed case text allows for the display of more words on a line than ALL CAPS - to see for yourself simply type out one sentence in ALL CAPS and the same sentence in mixed case, to compare. With allowing more words per line using mixed case text, that text can stay on the screen longer which allows for better reader comprehension.

The current standards and systems which allow for all capitalized text provides almost a worst case scenario for deaf and hard of hearing users. For instance, one satellite TV company has 8 font choices for closed captions, some of which are totally inappropriate for reading on a television screen, such as "Kaufman Bold", (*This is Kaufman Bold - CAN YOU IMAGINE READING THIS ON TV?*) which is a "handwriting script" and was intended for wedding invitations. It is illegible on a TV. Other cable companies only have one or two *illegible* fonts to choose from, with no controls over size or color or transparency or position. Some TV broadcasters unbelievably and disrespectfully caption

their live text in "ALL CAPS" causing eyestrain and lost information. Often the choice of TV shows to watch comes down to the legibility of the programs captions, but with live TV we have no option but to watch the show with captions that are in ALL CAPS. In this modern high speed computerized era, there is no longer any reason why captioned text cannot be of the highest quality in all metrics including the provision of them in normal mixed case.

The continued use of ALL CAPS in live or near-live programming also makes text discrimination more obvious. For instance, whenever CNN transcribes television audio that even hearing people cannot discern, (such as a 911 call or someone speaking a foreign language) CNN will caption (or subtitle) that audio in normal mixed case text, while at the same time, the same audio is also transcribed for deaf and hard of hearing people in lower quality, substandard, hard to read, ALL CAPS. See the attached video of CNNHD "OUR NIXON", where the "Watergate tapes" are being played back. The discrimination is so obvious, it's hard to believe the FCC allows this.

I really thought with the advent of the FCC's Disability Advisory Committee that these longstanding quality related issues in regards to captioning would have been resolved by now. Please don't hold up fixing these captioning problems. These media companies are multi billion dollar outfits and captions can be a simple standardized process provided that the FCC set some standards for all stakeholders to adhere too instead of "best practices" which often go unnoticed.

Thank you for allowing me to comment on this petition and I hope the principles contained therein can be implemented soon.

Very truly yours,



Alexander Johnson

Attachments:

"Our Nixon" - text discrimination, all caps, #1.pdf

"Our Nixon" - text discrimination, all caps, #2.pdf

"Our Nixon" - text discrimination, all caps, #3.pdf

"Our Nixon" -Program Listing - DIRECTV - CNNHD Channel 202 7-1-17.pdf